

James M. Finberg (SBN 114850)
Bill Lann Lee (SBN 108452)
Eve H. Cervantez (SBN 164709)
Chimène I. Keitner (SBN 226948)
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Todd M. Schneider (SBN 158253)
Guy B. Wallace (SBN 176151)
Joshua Konecky (SBN 182897)
SCHNEIDER & WALLACE
180 Montgomery Street, Suite 2000
San Francisco, CA 94104
Telephone: (415) 421-7100
Facsimile: (415) 421-7105

JOHN BURRIS (SBN 69888)
7677 Oakport Bldg., Suite 1120
Oakland, CA 94612
Telephone: (510) 839-5210
Facsimile: (510) 839-3882

Class Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DERRICK SATCHELL, KALINI BOYKIN, VALERIE BROWN, RICK GONZALES, CYNTHIA GUERRERO, RACHEL HUTCHINS, TYRONE MERRITT, KELVIN SMITH, SR., and KEN STEVENSON, on behalf of themselves and all others similarly situated.

Plaintiffs.

v.

FEDEX EXPRESS, a Delaware corporation,

Defendant.

Case No. C 03-2659 SI; C 03-2878 SI

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER ALLOWING DOCUMENTS TO
BE FILED UNDER SEAL (Local Rule 79-5)**

1 WHEREAS, Plaintiffs took the deposition of Michael John Snyder, a former
2 employee of Defendant FedEx Express ("FedEx"), on June 9, 2006 ("the Deposition");
3

4 WHEREAS, Defendant FedEx requests that the Deposition be treated as
5 confidential, and that the Deposition transcript be filed under seal;
6

7 WHEREAS, on November 21, 2005, this Court ordered that transcripts of
8 depositions of Michael John Snyder taken in other actions be filed under seal;
9

10 THEREFORE, the Parties, by and through their counsel, stipulate and request that
11 the transcript of the Deposition of Michael John Snyder taken in this action on June 9, 2006 (or
12 excerpts thereof) may be filed under seal pursuant to Local Rule 79-5.

13 SO STIPULATED.

14 Dated: August 25, 2006

15  Eve H. Cervantez

16 LIEFF, CABRASER, HEIMANN &
17 BERNSTEIN, LLP
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

18 Class Counsel

19  Gilmore F. Diekmann, Jr.

20 SEYFARTH & SHAW LLP
560 Mission Street, Suite 3100
San Francisco, CA 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

21 Counsel for the Defendant

22 Dated: _____

23  The Honorable Susan Illston
U.S. District Court Judge